

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

OLIVER ORTOLANI,

Plaintiff,

v.

**COMMUNITY OF JESUS, INC., ARTS
EMPOWERING LIFE, INC.,
PERFORMING ARTS BUILDING
FOUNDATION, INC.,**

Defendants.

Civil Case No.: 1:25-cv-12005-LTS

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' MOTIONS
TO DISMISS**

Plaintiff Oliver Ortolani, by and through his attorneys, respectfully moves this Court pursuant to Fed. R. Civ. P. 6(b) for an extension of 30 days to respond to Defendants' Motions to Dismiss. In support of this Motion, Plaintiff states:

1. Defendants filed their individual Motions to Dismiss, Consolidated Memorandum of Law, and supporting documents on December 1, 2025. *See* ECF Nos. 13-17.

2. The deadline for Plaintiff's response to Defendants' Motions to Dismiss is currently set for December 15, 2025.

3. Plaintiff requests an extension of 30 days, until January 14, 2026, to respond to Defendants' Motions to Dismiss.

4. This is the first request for extension of this deadline that Plaintiff has made.

5. Plaintiff makes this request as he is adding additional Massachusetts counsel to his legal team because of planned staffing changes, and new counsel will require time to get up to speed.

6. Plaintiff also makes this request due to the upcoming holiday season and planned vacation for his attorneys.

7. Plaintiff's counsel has consulted with counsel for Defendants, and Defendants do not oppose the relief requested in this Motion.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that the Court grant his unopposed Motion for Extension of Time to Respond to Defendants' Motions to Dismiss.

Dated: December 5, 2025

Respectfully submitted,

/s/ Carol Merchasin
Carol Merchasin (BBO# 556752)
Lillian Smith (*pro hac vice* forthcoming)
MCALLISTER OLIVARIUS
641 Lexington Avenue, 13th Floor
New York, New York 10022
(212) 433-3456
cmerchasin@mcotlaw.com
lsmith@mcotlaw.com

Attorneys for Plaintiff

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that Plaintiff's counsel has conferred with counsel for Defendants, and Defendants do not oppose the relief sought in this Motion.

/s/ Carol Merchasin
Carol Merchasin

CERTIFICATE OF SERVICE

I, Carol Merchasin, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 5, 2025.

/s/ Carol Merchasin
Carol Merchasin